

Barbara Kasoff
Cofounder, President

Terry Neese
Cofounder, President 2001-2005

Coalition Partners

American Small Business Coalition

American Women in Radio and Television

Association for Enterprise Opportunity

Association for Women in Communications

Association of Women's Business Centers

Black Women Enterprises

Boardroom Bound

Business Women's Network

CARE USA

Catalina Magazine

Center for Women's Business Research

Consumers for Cable Choice

Count Me In

Enterprising Women

Euro-American Women's Council
Europe – Greece

Executive Women In Government

Filipina Women's Network

Financial Women International

Hispanics Impacting Public Policy

Kansas City Council of Women Business Owners

LATINA Style

Moms In Business Network

National Associations for Female Executives

National Association of Certified Government Business Enterprise

National Association of Small Disadvantaged Businesses

National Association of Women Business Owners

National Business Association

National Defense Industrial Association

National Indian Business Association

National Women Business Owners Corporation

Native American Women's Business Council

New Jersey Association of Women Business Owners

Oklahoma State Chamber

San Francisco Small Business Network

Small Business & Entrepreneurship Council

Small Business Television Network

U.S. Chamber of Commerce

UNIFEM / USA

Women Construction Owners & Executives

Women Entrepreneurs, Inc.

Women Impacting Public Policy – Florida

Women Impacting Public Policy – Pennsylvania

Women in Technology International

Women Presidents' Organization

Women's Business Enterprise National Council

Women's Leadership Exchange



September 28, 2007

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Jonathan Adelstein
Commissioner Robert McDowell

Re: Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25, RM-10593

Dear FCC Chairman and Commissioners:

I am writing to you today on behalf of Women Impacting Public Policy (WIPP), the nation's largest bi-partisan women's business group. Our organization advocates for and on behalf of women and minorities in business, strengthening their sphere of influence in the legislative process of our nation, creating economic opportunities and building bridges and alliances to other small business organizations.

The FCC's recent decision to re-evaluate the special access marketplace is of particular interest to our organization. Recent evidence indicates that since the FCC's 1999 decision to de-regulate the special access market in areas that proved competitive, prices in these areas have dropped. The competition present in today's marketplace is beneficial to businesses and consumers. In light of these developments we urge the Commission to collect additional data and information on this issue *before* taking the drastic step of re-regulation.

The pricing flexibility plans that were implemented in 1999 have led to lower prices and improvements in technology and service. Areas with Phase II pricing flexibility saw prices decline by as much as 6%, according to a November 2006 GAO study. Furthermore, a recent Progress & Freedom Center study suggests that deregulation has led to increased investment. The paper states that the number of special access lines increase in areas with greater pricing flexibility.

In addition to lower prices and more investments, the special access market has seen continued success by existing competitors and the entry of new types of competitors for the ILECs. CLEC competitors have achieved enormous success over a relatively limited period of time. XO Communications has deployed 1.16 million fiber miles through 40 major U.S. cities while Level 3 Communications currently serves 125 metro fiber markets. Furthermore, other wireless and cable companies are challenging ILECs. Sprint has partnered with ClearWire to build a national WiMax network to limit the costs of routing calls to switching centers. Comcast has stated that offering services to small and midsize businesses will be its top priority over the next 2 years.

The entry of new competitors and their desire to win over business customers signals the pro-competitive nature of the special access market. This leads one to conclude that the deregulation of special access services has created the correct incentives for investment in current and new technologies, technologies that offer reliable service and competitive prices to business customers and a return on those investments for the companies that make them. We urge the FCC to consider these facts when examining the special access marketplace, as this decision will have far-reaching consequences on businesses of all sizes.

Sincerely,

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1714 Stockton Street, Suite 200, San Francisco, CA 94133 ~ 415.434.4314 ~ Fax: 415.434.4331
Website: www.WIPP.org

A handwritten signature in blue ink that reads "Barbara Kasoff". The signature is fluid and cursive, with the first name "Barbara" and last name "Kasoff" clearly distinguishable.

Barbara Kasoff